

# EXHIBIT D

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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

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UNITED STATES OF AMERICA

v.

FELIX SANTIAGO, III  
a/k/a "Urkel"

**CRIMINAL COMPLAINT**

Mag. No. 19-6648

I, Michael Patti, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

**SEE ATTACHMENT A**

I further state that I am a Task Force Officer with the United States Drug Enforcement Administration, and that this Complaint is based on the following facts:


**SEE ATTACHMENT B**

Continued on the attached page and made a part hereof.

  
\_\_\_\_\_  
Task Force Officer Michael Patti  
U.S. Drug Enforcement Administration

Sworn to before me and subscribed in my presence,  
April 12, 2019, in Essex County New Jersey

Honorable Joseph A. Dickson  
United States Magistrate Judge

  
\_\_\_\_\_  
Signature of Judicial Officer

**ATTACHMENT A**

On or about April 11, 2019, in Hudson County, in the District of New Jersey and elsewhere, defendant

FELIX SANTIAGO, III  
a/k/a "Urkel"

did knowingly and intentionally conspire and agree with others to distribute and possess with intent to distribute a quantity of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1) and (b)(1)(c).

In violation of Title 21, United States Code, Section 846.

**ATTACHMENT B**

I, Michael Patti, am a Task Force Officer with the United States Drug Enforcement Administration ("DEA"). I am fully familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers, and my review of reports, documents, and other items of evidence. Because this Complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation. Where statements of others are related herein, they are related in substance and part. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

1. In or around late 2018, law enforcement began investigating Felix Santiago, III ("SANTIAGO") for narcotics-related offenses. During the course of the investigation, a distinct pattern emerged. That pattern suggested that SANTIAGO was travelling to Puerto Rico and shipping narcotics back to himself in the United States through the mail.

2. On various occasions, SANTIAGO travelled to Puerto Rico for short trips. Within a few days of SANTIAGO'S arrival in Puerto Rico, one or more packages would be shipped to one of two central locations in Jersey City, New Jersey. SANTIAGO would then travel back to New Jersey, in time for the respective parcel's arrival. On multiple occasions, surveillance revealed that an associate of SANTIAGO ("Co-Conspirator-1") would take possession of the respective parcel and deliver it to SANTIAGO at a business that SANTIAGO owns in Jersey City, New Jersey ("Location-1").

3. On or about April 5, 2019, law enforcement learned that SANTIAGO had flown from Newark, New Jersey to Puerto Rico.

4. On or about April 9, 2019, a package bearing a USPS tracking number ending in 7949 (the "7949 Parcel") was mailed from San Juan, Puerto Rico to Location-1.

5. On or about April 11, 2019, the 7949 Parcel arrived in New Jersey. A canine trained in narcotics-detection indicated that the 7949 Parcel contained narcotics. Law enforcement subsequently opened the 7949 Parcel and located two electronic speaker-type devices, each containing a package of suspected narcotics, which field tested positive for the presence of cocaine and were determined to weigh approximately 400 grams.

6. On or about April 11, 2019, law enforcement conducted a controlled delivery of the 7949 Parcel to Location-1. Prior to delivery, law enforcement

removed the packages of cocaine and inserted packages of imitation narcotics, which contained small amounts of cocaine. Shortly after delivering the 7949 Parcel, law enforcement observed SANTIAGO take custody of it and enter the basement at Location-1. Law enforcement proceeded to enter the basement and immediately observed that SANTIAGO appeared to be opening the 7949 Parcel, at which time SANTIAGO was arrested.